

LAW OFFICES OF
GOOD, WILDMAN, HEGNESS & WALLEY
5000 CAMPUS DRIVE
NEWPORT BEACH, CALIFORNIA 92660-2181
(949) 955-1100

1 GOOD WILDMAN HEGNESS & WALLEY
2 THOMAS E. WALLEY, SBN: 46115
3 HEIDI STILB LEWIS, SBN: 98046
4 5000 Campus Drive
5 Newport Beach, California 92660
6 Telephone: (949) 955-1100
7 Facsimile: (949) 833-0633

8 Attorneys for Plaintiffs and Cross-Defendants, Hattie Bryant and Bruce Camber

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

11 HATTIE BRYANT and
12 BRUCE CAMBER, a married couple,
13 Plaintiffs and Cross-
14 Defendants,

15 v.

16 JOHN GARCIA
17 Defendant and Cross-
18 Complainant

19 And Related Cross-Action

CASE NO. 30-200900122059
JUDGE: Randell Wilkinson
DEPT: C25

RESPONDENT'S REQUESTS FOR
ADMISSIONS, SET NO. ONE

20 PROPOUNDING PARTY: Plaintiffs and Cross-Defendants, HATTIE BRYANT and
21 BRUCE CAMBER

22 RESPONDING PARTY: Defendant and Cross-Complainant, JOHN GARCIA

23 SET NO.: ONE

24 REQUEST FOR ADMISSIONS, Set Number One, are hereby propounded on Responding
25 Party, JOHN GARCIA (sometimes referred to herein as, "YOU" or "YOUR"), by Plaintiffs and
26 Cross-Defendants, HATTIE BRYANT and BRUCE CAMBER (sometimes referred to herein as,
"PROPOUNDING PARTY")

27 PLEASE TAKE NOTICE that, YOU are hereby requested, within 30 days after the service
28 of this Request for Admissions, to admit the truthfulness of each of the facts set forth below.

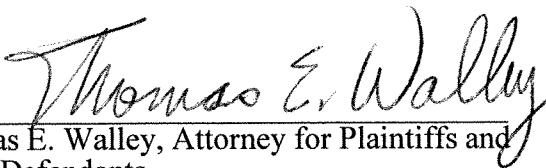
LAW OFFICES OF
GOOD, WILDMAN, HEGNESS & WALLEY
5000 CAMPUS DRIVE
NEWPORT BEACH, CALIFORNIA 92660-2181
(949) 955-1100

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- 17. YOU defrauded Bruce Camber.
- 18. Angel Strategies, LLC has never been profitable.
- 19. No investor in Angel Strategies, LLC has ever received a return on investment.
- 20. The Desist and Refrain Order attached as Exhibit "A" hereto is a true and correct document issued to YOU by the California Department of Corporations.

Good, Wildman, Hegness & Walley

Dated: October 9, 2009

By: 
Thomas E. Walley, Attorney for Plaintiffs and
Cross-Defendants

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

STATE OF CALIFORNIA
BUSINESS, TRANSPORTATION AND HOUSING AGENCY
DEPARTMENT OF CORPORATIONS

TO: John Garcia, Managing Principal
Angel Strategies, LLC
17602 17th Street, Suite 102
Tustin, CA 92780-7915

DESIST AND REFRAIN ORDER

(For violations of Corporations Code Section 25401)

The California Corporations Commissioner finds that:

1. At all relevant times, John Garcia ("Garcia") was the Managing Principal of Angel Strategies, LLC ("Angel Strategies"), a California limited liability company with an address at 17602 17th Street, Suite 102, Tustin, California 92780-7915.

2. At all relevant times, Angel Strategies, a California limited liability company, conducted business at 17602 17th Street, Suite 102, Tustin, California 92780-7915.

3. Beginning in or around 2000, Garcia and Angel Strategies offered or sold securities in the form of shares of Angel Strategies stock through face-to-face meetings with individual investors.

4. The purported purpose of the offering of these securities was to raise funds to find investment opportunities and evaluate early-stage companies on behalf of its network of investors, investment banks, and venture capital firms.

5. In connection with the sale of these securities, Garcia misrepresented that there were two hundred (200) investors in Angel Strategies, each of whom had invested over one million dollars (\$1,000,000.00); when, in fact, Angel Strategies had only thirty-nine (39) investors, each of whom had invested much less than the one million dollars (\$1,000,000.00) Garcia had claimed.

///

///

///


1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Based upon the foregoing, the California Corporations Commissioner is of the opinion that the securities of Angel Strategies were offered or sold in this state by means of written or oral communications which included an untrue statement of a material fact or omitted to state a material fact necessary in order to make the statements made, in light of the circumstances under which they were made, not misleading, in violation of Section 25401 of the Corporate Securities Law of 1968. Pursuant to Section 25532 of the Corporate Securities Law of 1968, Angel Strategies, LLC, and John Garcia are hereby ordered to desist and refrain from offering or selling, or buying or offering to buy, any security in the State of California, including but not limited to shares of Angel Strategies, LLC stock, by means of any written or oral communication which includes an untrue statement of a material fact, or omits to state a material fact necessary in order to make the statements made, in the light of the circumstances under which they were made, not misleading.

This Order is necessary, in the public interest, for the protection of investors and consistent with the purposes, policies, and provisions of the Corporate Securities Law of 1968.

Dated: September 17, 2009
Los Angeles, California

PRESTON DuFAUCHARD,
California Corporations Commissioner

By 
ALAN S. WEINGER
Deputy Commissioner
Enforcement Division



ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Thomas E. Walley, Esq., SBN: 46115 GOOD, WILDMAN, HEGNESS & WALLEY 5000 Campus Drive Newport Beach, CA 92660 TELEPHONE NO.: 949/955-1100 FAX NO. (Optional): 949/833-0633 E-MAIL ADDRESS (Optional): twalley@goodwildman.com ATTORNEY FOR (Name): Hattie Bryant and Bruce Camber	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Orange STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: Same CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center	
PLAINTIFF/PETITIONER: HATTIE BRYANT and BRUCE CAMBER, a married couple DEFENDANT/RESPONDENT JOHN GARCIA	CASE NUMBER: 30-200900122059
<p style="text-align: center;">PROOF OF SERVICE—CIVIL</p> Check method of service (only one): <input type="checkbox"/> By Personal Service <input checked="" type="checkbox"/> By Mail <input type="checkbox"/> By Overnight Delivery <input type="checkbox"/> By Messenger Service <input type="checkbox"/> By Fax <input type="checkbox"/> By Electronic Service	JUDGE: DEPT.:

(Do not use this proof of service to show service of a Summons and complaint.)

1. At the time of service I was over 18 years of age and not a party to this action.
2. My residence or business address is:
5000 Campus Drive, Newport Beach, CA 92660
3. The fax number or electronic notification address from which I served the documents is *(complete if service was by fax or electronic service)*: 949-833-0633; andrea@goodwildman.com
4. On *(date)*: October 15, 2009 I served the following documents *(specify)*: FORM INTERROGATORIES--GENERAL (SET ONE); RESPONDENT'S REQUESTS FOR ADMISSIONS, SET NO. ONE.

The documents are listed in the *Attachment to Proof of Service—Civil (Documents Served)* (form POS-040(D)).

5. I served the documents on the person or persons below, as follows:

- a. Name of person served: Harrison Gavin Long, Esq.
- b. *(Complete if service was by personal service, mail, overnight delivery, or messenger service.)*
Business or residential address where person was served: 2901 West Coast Highway, Ste 200
Newport Beach, CA 92663-4045
- c. *(Complete if service was by fax or electronic service.)*
(1) Fax number or electronic notification address where person was served: 949-263-5994;
harrison@californiatrialatty.com
(2) Time of service:

The names, addresses, and other applicable information about persons served is on the *Attachment to Proof of Service—Civil (Persons Served)* (form POS-040(P)).

6. The documents were served by the following means *(specify)*:

- a. **By personal service.** I personally delivered the documents to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents, in an envelope or package clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

(Continued on back)

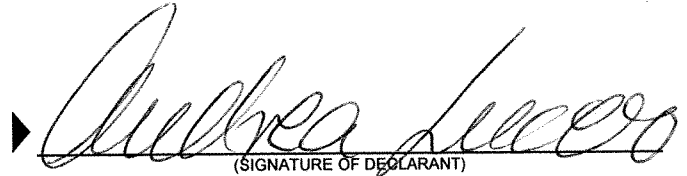
CASE NAME Bryant/Camber v Garcia	CASE NUMBER: 30-200900122059
----------------------------------	---------------------------------

6. b. **By United States mail.** I enclosed the documents in a sealed envelope or package addressed to the persons at the addresses in item 5 and (*specify one*):
- (1) deposited the sealed envelope with the United States Postal Service, with the postage fully prepaid.
 - (2) placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid.
- I am a resident or employed in the county where the mailing occurred. The envelope or package was placed in the mail at (*city and state*): Newport Beach, CA
- c. **By overnight delivery.** I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the persons at the addresses in item 5. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.
- d. **By messenger service.** I served the documents by placing them in an envelope or package addressed to the persons at the addresses listed in item 5 and providing them to a professional messenger service for service. (*A declaration by the messenger must accompany this Proof of Service or be contained in the Declaration of Messenger below.*)
- e. **By fax transmission.** Based on an agreement of the parties to accept service by fax transmission, I faxed the documents to the persons at the fax numbers listed in item 5. No error was reported by the fax machine that I used. A copy of the record of the fax transmission, which I printed out, is attached.
- f. **By electronic service.** Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed in item 5. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: October 15, 2009

Andrea Lucero
(TYPE OR PRINT NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)

(If item 6d above is checked, the declaration below must be completed or a separate declaration from a messenger must be attached.)

DECLARATION OF MESSENGER

- By personal service.** I personally delivered the envelope or package received from the declarant above to the persons at the addresses listed in item 5. (1) For a party represented by an attorney, delivery was made to the attorney or at the attorney's office by leaving the documents in an envelope or package, which was clearly labeled to identify the attorney being served, with a receptionist or an individual in charge of the office, between the hours of nine in the morning and five in the evening. (2) For a party, delivery was made to the party or by leaving the documents at the party's residence with some person not younger than 18 years of age between the hours of eight in the morning and six in the evening.

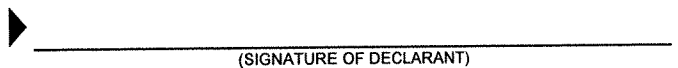
At the time of service, I was over 18 years of age. I am not a party to the above-referenced legal proceeding.

I served the envelope or package, as stated above, on (*date*):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(NAME OF DECLARANT)


(SIGNATURE OF DECLARANT)